REMARKS

The Applicants respectfully request reconsideration of this application in view of the above amendments and the following remarks.

35 U.S.C. §103(a) Rejection – Stewart, Kramer, Halme

The Examiner has rejected claims 33-36, 38, 40, 42-43, 45, 48, 50-52 and 54-58 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,571,221 issued to Stewart (hereinafter "Stewart") in view of U.S. Patent Application Publication No. 2002/0099957 issued to Kramer (hereinafter "Kramer") and in view of U.S. Patent No. 7,099,284 issued to Halme (hereinafter "Halme"). The Applicants respectfully submit that the present claims are allowable over Stewart, Kramer and Halme.

Claim 22 pertains to:

"*An apparatus to reside in a data center coupled between a public network and a server of the data center, the apparatus comprising:*

a first interface to the public network to receive Secure Sockets Layer (SSL) encrypted data from at least one wired client device and to receive Wireless Transport Layer Security (WTLS) encrypted data from at least one wireless client device;

client-type determining logic to determine whether a client device requesting a secure connection is a wired client device or a wireless client device;

logic to perform a wired authentication to establish the secure connection when it is determined that the requesting client device is the wired client device;

logic to perform a wireless authentication to establish the secure connection when it is determined that the requesting client device is the wireless client device;

logic to convert the SSL encrypted data to an unencrypted format and to convert the WTLS encrypted data to an unencrypted format; and

a second interface to provide the data in the unencrypted formats to the server of the data center".

Stewart, Kramer and Halme do not disclose these limitations or render them obvious.

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Stewart pertains to a network communication service with an improved subscriber model using digital certificates. See e.g., the Title. However, Stewart does not disclose or render obvious the claimed apparatus **to reside in a data center coupled between a public network and a server of the data center** that comprises **a first interface to the public network** to receive **SSL and WTLS encrypted data,** and that has **logic to convert the SSL and WTLS encrypted data to unencrypted formats,** and that has **a second interface to provide the data in the unencrypted formats to the server of the data center,** in combination with the other claim limitations.

Firstly, as understood by Applicants, Stewart does not disclose logic to convert the SSL and WTLS encrypted data to unencrypted formats. In fact, Stewart does not even appear to mention "WTLS". The Examiner appears to agree, since on page 3 of the present Office Action, the Examiner has stated that "*Stewart does not teach SSL, WTLS or converting encrypted data to an unencrypted format*".

Secondly, in rejecting claim 33, the Examiner has relied upon features of both the hybrid wired and wireless access point 124 and the service provider 140. See e.g., pages 2-3 of the present Office Action. However, Applicants respectfully submit that it is inappropriate. The hybrid wired and wireless access point 124 and the service provider 140 are different components and are separated by a centralized network 130. Furthermore, claim 33 recites that the apparatus is to reside in a data center coupled between a public network and a server of the data center and has the claimed first and second interfaces. The hybrid wired and wireless access point 124 does not reside in a data center coupled between a public network and a server of the data center.

Thirdly, Stewart does not disclose or render obvious a second interface to provide the data in the unencrypted formats to the server of the data center. As discussed above, the hybrid wired and wireless access point 124 is not within a data center. Stewart does not disclose that the service provider 140 have a second interface to provide data in the unencrypted formats to a server of a data center.

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Kramer does not remedy all of what is missing from Stewart. Kramer discusses establishing a secure connection with a private corporate network over a public network. See e.g., the Title. Kramer discusses in paragraph [0050] "*the external client secures the connection 430*" and that "*The security for the connection may be provided by using Secured Socket Layer (SSL) protocol or Wireless Transport Layer Security (WTLS) security*". However, as understood by Applicants, the SSL and the WTLS are used by the "*external client*" (e.g., external client 340). The external client 340 does not reside in a data center coupled between a public network and a server of the data center. Furthermore, Kramer does not disclose that the VPN access server 314 has logic to convert the SSL encrypted data to an unencrypted format and to convert the WTLS encrypted data to an unencrypted format. Kramer does not even disclose that the VPN access server 314 receive WTLS data. It should not be assumed that just because the external client uses WTLS that the VPN access server 314 would receive WLTS. Rather, as understood by Applicants, conversion from WTLS to another format (e.g., SSL) would typically be performed before reaching the VPN access server 314 e.g., in a WAP gateway of the like. Accordingly, Stewart and Kramer do not appear to disclose the claimed logic to convert the SSL and WTLS encrypted data to unencrypted formats.

Halme does not remedy all of what is missing from Stewart and Kramer. Halme discusses a data transmission control and performance monitoring method of an IPSEC link in a virtual private network. See e.g., the Title. However, Halme does not disclose or render obvious logic to convert the SSL encrypted data to an unencrypted format and to convert the WTLS encrypted data to an unencrypted format. The Examiner does not even appear to have relied upon Halme for this limitation.

Accordingly, **Stewart, Kramer and Halme do not disclose or render obvious the claimed apparatus to reside in a data center coupled between a public network and a server of the data center that comprises a first interface to the public network to receive SSL and WTLS encrypted data, and that has logic to convert the SSL and WTLS encrypted data to unencrypted**

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formats, and that has **a second interface to provide the data in the unencrypted formats to the server of the data center**, in combination with the other claim limitations.

For at least one or more of these reasons, claim 33 and its dependent claims are believed to be allowable over <u>Stewart</u>, <u>Kramer</u> and <u>Halme</u>.

Independent claims 42, 50, 56, and 59, and their respective dependent claims, are believed to be allowable for one or more similar reasons.

35 U.S.C. §103(a) Rejection – Stewart, Kramer, Halme, Douglas

The Examiner has rejected claims 37, 41, 44, 46 and 49 under 35 U.S.C. §103(a) as being unpatentable over <u>Stewart</u> in view of <u>Kramer</u>, <u>Halme</u> and U.S. Patent Application Publication No. 2004/0010684 issued to <u>Douglas</u> (hereinafter "<u>Douglas</u>").

As discussed above, the independent claims 33, 42, 50, 56, and 59, are believed to be allowable over <u>Stewart</u>, <u>Kramer</u> and <u>Halme</u>. As understood by Applicants, the Examiner hasn't relied upon <u>Douglas</u> as disclosing all of what is missing from <u>Stewart</u>, <u>Kramer</u> and <u>Halme</u>. Accordingly, these independent claims are believed to be allowable. The dependent claims 37, 41, 44, 46 and 49, are believed to be allowable therefor, as well as for the recitations set forth in these dependent claims. At this time, Applicants elect not to address other aspects of the rejection of these dependent claims, including whether these references should be combined.

35 U.S.C. §103(a) Rejection – Stewart, Kramer, Halme, Hajmiragha

The Examiner has rejected claims 39 and 47 under 35 U.S.C. §103(a) as being unpatentable over <u>Stewart</u> in view of <u>Kramer</u>, <u>Halme</u> and U.S. Patent No. 6,289,460 issued to <u>Hajmiragha</u> (hereinafter "<u>Hajmiragha</u>").

As discussed above, the independent claims 33, 42, 50, 56, and 59, are believed to be allowable over <u>Stewart</u>, <u>Kramer</u> and <u>Halme</u>. As understood by Applicants, the Examiner hasn't

relied upon <u>Hajmiragha</u> as disclosing all of what is missing from <u>Stewart, Kramer</u> and <u>Halme</u>. Accordingly, these independent claims are believed to be allowable. The dependent claims 39 and 47, are believed to be allowable therefor, as well as for the recitations set forth in these dependent claims. At this time, Applicants elect not to address other aspects of the rejection of these dependent claims, including whether these references should be combined.

35 U.S.C. §103(a) Rejection – Stewart, Kramer, Halme, Stubblebine

The Examiner has rejected claim 53 under 35 U.S.C. §103(a) as being unpatentable over <u>Stewart</u> in view of <u>Kramer, Halme</u> and U.S. Patent No. 6,216,231 issued to <u>Stubblebine</u> (hereinafter "<u>Stubblebine</u>").

As discussed above, the independent claims 33, 42, 50, 56, and 59, are believed to be allowable over <u>Stewart, Kramer</u> and <u>Halme</u>. As understood by Applicants, the Examiner hasn't relied upon <u>Stubblebine</u> as disclosing all of what is missing from <u>Stewart, Kramer</u> and <u>Halme</u>. Accordingly, these independent claims are believed to be allowable. The dependent claim 53 is believed to be allowable therefor, as well as for the recitations set forth in these dependent claims. At this time, Applicants elect not to address other aspects of the rejection of these dependent claims, including whether these references should be combined.

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Conclusion

In view of the foregoing, it is believed that all claims now pending patentably define the subject invention over the cited art of record and are in condition for allowance. Applicants respectfully request that the rejections be withdrawn and the claims be allowed at the earliest possible date.

Request For Telephone Interview

The Examiner is invited to call Brent E. Vecchia at (303) 740-1980 if there remains any issue with allowance of the case.

Request For An Extension Of Time

The Applicants respectfully petition for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17 for such an extension.

Charge Our Deposit Account

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: May 21, 2008   By _____
                              Brent E. Vecchia, Reg. No. 48,011
                              Tel.: (303) 740-1980 (Mountain Time)

1279 Oakmead Parkway
Sunnyvale, California 94085-4040